## **EXHIBIT A**

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# **Greenberg Traurig**

Valerie W. Ho Tel 310.586.7841 Fax 310.586.7800 HoV@gtlaw.com

June 4, 2007

#### Via E-Mail and U.S. Mail

Rel Ambrozy, Esq. McKenna Long & Aldridge LLP 1900 K Street, N.W. Washington, D.C. 20006

Re: LG Philips LCD Co., Ltd. vs. ViewSonic Corporation, et al.

Delaware District Court, Case No. 04-343 JJF

#### Dear Rel:

In advance of the depositions of Peter Farzin, Vincent Liu and Jamie Yang scheduled for this week, we would like to confirm that the depositions and the Rule 30(b)(6) topics noticed by LPL will be limited to the accused products identified in LPL's interrogatory responses. LPL has sought and obtained multiple extensions of time to identify accused products and multiple postponements of the depositions of Tatung Company's and Tatung Company of America's technical witnesses. LPL sought the postponements on the grounds that it needed additional time to identify accused products. Even though Mr. Liu and Ms. Yang had traveled to the United States from Taiwan in March 2007 and were prepared to testify then, LPL insisted that their depositions be continued until LPL could provide a definitive list of accused products. LPL sought to postpone Mr. Farzin's deposition on the same grounds. Based on these representations, our understanding is that the depositions are limited to the accused products.

The deadline for LPL to identify accused products has long passed, and the Special Master has denied LPL's request for additional time to accuse more products. As a result, discovery regarding unaccused products at this point is unnecessary, burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

Rel Ambrozy, Esq. June 4, 2007 Page 2

Please confirm that the depositions will be limited to the accused products. If we do not receive such confirmation from LPL by 10:00 a.m. on June 5, 2007, we will file a motion for protective order pursuant to Rule 26(c). We are available to discuss this issue before 10:00 a.m. tomorrow.

Very truly yours,

Valerie W. Ho

cc: Counsel on service list (via email)

Valence the for.

## **EXHIBIT B**

### Oh, Charlene L. (Assoc-LA-LT)

From: Sent:

Ho, Valerie W (Shld-LA-LT) Tuesday, June 05, 2007 9:43 AM Oh. Charlene L. (Assoc-LA-LT)

To: Subject:

Fw: LG Philips LCD Co , Ltd v Tatung Company, et al. - Letter to Rel Ambrozy

Valerie Ho

\_\_\_\_\_\_ Sent from my BlackBerry Wireless Handheld

---- Original Message -----

From: Ambrozy, Rel <rambrozy@mckennalong.com>

To: Ho, Valerie W. (Shld-LA-LT); Christenson, Cass <cchristenson@mckennalong.com>; Brzezynski, Lora < lbrzezynski@mckennalong.com>; rkirk@bayardfirm.com <rkirk@bayardfirm.com>; MNelson@cblh.com <MNelson@cblh.com>; troman@raskinpeter.com <troman@raskinpeter.com>; SMiller@cblh.com <SMiller@cblh.com>; JHeisman@cblh.com <JHeisman@cblh.com>; Connor, Cormac <cconnor@mckennalong.com>

Cc: Krietzman, Mark H. (Shld-LA-IP); Merideth, Frank (Shld-LA-LT); Jansen, Allan W. (Shld-

OC-IP)

Sent: Tue Jun 05 09:39:11 2007

Subject: RE: LG. Philips LCD Co., Ltd. v. Tatung Company, et al. - Letter to Rel Ambrozy

#### Valerie:

We obviously disagree with your review of the facts - the depositions were postponed because Tatung failed to produce responsive documents. Moreover, we disagree with Tatung's last minute demand to limit the scope of our examination. This is an issue that should have been raised long ago.

Rel.

From: HoV@GTLAW.com [mailto:HoV@GTLAW.com]

Sent: Monday, June 04, 2007 9:54 PM

To: Ambrozy, Rel; Christenson, Cass; Brzezynski, Lora; rkirk@bayardfirm.com; MNelson@cblh.com; troman@raskinpeter.com; SMiller@cblh.com; JHeisman@cblh.com; Connor, Cormac

Cc: KrietzmanM@GTLAW.com; MeridethF@GTLAW.com; JansenA@gtlaw.com Subject: LG. Philips LCD Co., Ltd. v. Tatung Company, et al. - Letter to Rel Ambrozy

Dear Counsel,

Please see attached letter. Thanks.

Valerie

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